

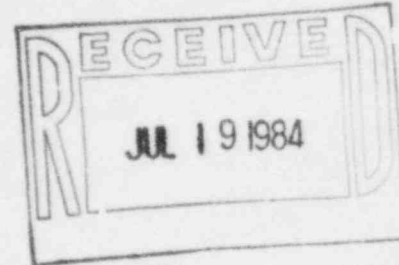


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July 13, 1984

W3K84-1613
Q-3-A35.07.112



Mr. John T. Collins
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

REFERENCE: Telecon C. Hooper (LP&L) and D. Jourdan (NRC IV) on June 12, 1984

Dear Mr. Collins:

SUBJECT: Waterford SES Unit No. 3
Docket No. 50-382
Significant Construction Deficiency No. 112
"Design Change Via Memoranda"
First Interim Report

In accordance with the requirements of 10CFR50.55(e), we are hereby providing two copies of the Interim Report of Significant Construction Deficiency No. 112, "Design Changes Via Memoranda". This item was previously identified as PRD No. 173.

Very truly yours,

T. F. Gerrets
T. F. Gerrets
Corporate Quality Assurance Manager

TFG:CNH:VBR

Attachment

cc: Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Mr. John T. Collins

July 13, 1984

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cc: Director
Office of Management
Information and Program Control
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. E. L. Blake
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

Mr. W. M. Stevenson
Monroe & Lemann
1424 Whitney Building
New Orleans, Louisiana 70130

Records Center
Institute of Nuclear Power Operations
1100 Circle 75 Parkway, Suite 1500
Atlanta, Georgia 30339

Mr. W. A. Cross
7910 Woodmont Avenue
Suite 1200
Bethesda, Maryland 20814

Mr. K. W. Cook
Waterford 3 SES
Post Office Box B
Killona, Louisiana 70066

FIRST INTERIM REPORT
SIGNIFICANT CONSTRUCTION DEFICIENCY NO. 112
"DESIGN CHANGES VIA MEMORANDA"

INTRODUCTION

This report is submitted pursuant to 10CFR50.55(e). It describes the transmittal of design changes without the issuance of an applicable design change document.

To the best of our knowledge, this deficiency has not been reported to the USNRC pursuant to 10CFR21.

DESCRIPTION

During the Ebasco Quality Assurance Review of J.A. Jones' Speed Letters and Engineering Information Request (EIR); more than two hundred fifty items were identified that transmitted design changes without reference to formal design change documents. This correspondence was between J.A. Jones and Ebasco Construction Engineering. The research of these items found that, for many, no formal design change documents had been issued. The subject of these changes was Typically relocations of embedded items to clear interferences and adding rebar splices.

SAFETY SIGNIFICANCE

The safety significance of this concern is that design changes affecting plant safety may have been made informally in the field circumventing the programmatic review and follow-up action to formalize the change. Based on preliminary results of the ongoing review, this does not appear to be the case. It cannot, however, be confirmed until the review is complete.

CORRECTIVE ACTION

The evaluation of the J.A. Jones' Speed Letters and EIR's is being performed by ESSE to determine the acceptability of the changes.

In order to determine if items which could affect plant safety were noted on informal documents, such as Speed Letter and EIR's by Contractors other than J.A. Jones, a sample program was developed. The sample program consists of a minimum 10% review of the documents of this nature for each contractor performing safety related work.

At present, the review and evaluation of these documents has not found any changes not acceptable per design.

An update or Final Report will be submitted to the USNRC on or before July 31, 1984.